

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHRISTINE ASIA CO., LTD., et al.,

Plaintiffs,

v.

JACK YUN MA, et al.,

Defendants.

No.: 1:15-md-02631 (CM) (SDA)

Related cases:

1:15-cv-00759-CM

1:15-cv-00811-CM

1:15-cv-00991-CM

1:15-cv-01405-CM

1:15-cv-05020-CM

1:15-cv-04991-CM

1:15-cv-05002-CM

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that, pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice (“Preliminary Approval Order,” ECF No. 126), on October 16, 2019 at 10:00 a.m., before the Honorable Colleen McMahon, in Courtroom 24A of the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, NY 10007, Class Representatives William Tai and Christine Asia Co., Ltd., Abel Amoros, Arthur Gabriel, Raymond Lee, and Gang Liu (collectively, “Plaintiffs”)¹ will and hereby do move the Court to: (1) grant final approval of the Settlement in the above-captioned action on the terms set forth in the Stipulation; and (2) approve the proposed Plan of Allocation for distribution of the Net Settlement Fund.

This motion is based on this Notice of Motion; the memorandum of points and authorities in support thereof; the Declaration of Laurence M. Rosen in Support of (I) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

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¹ All capitalized terms that are not otherwise defined herein have the same meanings as set forth in the Stipulation of Settlement dated April 26, 2019 (“Stipulation,” ECF No. 123-1).

Dated: September 11, 2019

THE ROSEN LAW FIRM P.A.

By: s/ Laurence Rosen

Laurence Rosen

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Counsel for Plaintiffs and the Class

PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On September 11, 2019, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 11, 2019.

s/ Laurence M. Rosen
Laurence M. Rosen